

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**BMG RIGHTS MANAGEMENT
(US) LLC, and ROUND HILL
MUSIC LP**

Plaintiffs,

V.

Case No. 1:14-cv-1611(LO/JFA)

**COX COMMUNICATIONS, INC.,
COXCOM, LLC**

Defendants.

[PROPOSED] ORDER

Having considered *Plaintiffs' Motion in Limine No. 1 to Exclude Introduction of Irrelevant Information About Rightscorp, Inc.*, it is hereby ORDERED that the Motion is GRANTED. It is further ORDERED that Defendants are prohibited from offering evidence or argument concerning the following:

1. Rightscorp Inc.'s ("Rightscorp") business practices after 2011, including evidence concerning Rightscorp's telephone agents, Rightscorp's phone script, or any Rightscorp call recordings;
2. Rightscorp's finances;
3. Allegations that Rightscorp violated debt collection or private investigation licensing laws or engaged in the unlicensed practice of law;

It is further ORDERED that Defendants are prohibited from using derogatory terms such as “troll,” “blackmailer,” and “extortionist” in reference to Rightscorp or Plaintiffs and are

prohibited from using terms like “extortion” or “blackmail” to describe the companies’ communications or business practices.

It is so ORDERED this _____ day of _____, 2015.

Judge for the Eastern District of Virginia